| Ç           | ase 2:23-cv-02056-GMN-BNW   | Document 129 | Filed 02/06/25                 | Page 1 of 6      |  |  |  |
|-------------|---|--------------|--------------------------------|------------------|--|--|--|
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| 8<br>9      | Telephone: (832) 239-3939<br>Facsimile: (832) 239-3600<br>Email: nmperry@jonesday.com   |              |                                |                  |  |  |  |
| 10          | Patrick G. Byrne<br>Nevada Bar No. 7636   |              |                                |                  |  |  |  |
| 11          | Dawn Davis Nevada Bar No. 13329   |              |                                |                  |  |  |  |
| 12          | SNELL & WILMER 3883 Howard Hughes Parkway, Suite 1100   |              |                                |                  |  |  |  |
| 13          | Las Vegas, NV 89169 Telephone: (702) 784-5275   |              |                                |                  |  |  |  |
| 14<br>15    | Facsimile: (702) 784-5252 Email: pbyrne@swlaw.com ddavis@swlaw.com  |              |                                |                  |  |  |  |
| 16          | Attorneys for Defendant   |              |                                |                  |  |  |  |
| 17          | Wynn Las Vegas, LLC   |              |                                |                  |  |  |  |
| 18          | UNITED STATES DISTRICT COURT DISTRICT OF NEVADA   |              |                                |                  |  |  |  |
| 19          |   |              |                                |                  |  |  |  |
| 20          | C.C., individually,   |              | Case No. 2:23-cv-02            | 2056-GMN-BNW     |  |  |  |
| 21          | Plaintiff,  |              | TIPULATION AN<br>MODIFYING DEA |                  |  |  |  |
| 22          | v.  | F            |                                | AINTIFF'S SECOND |  |  |  |
| 23          | JAMAL F. RASHID, et al.,  |              |                                |                  |  |  |  |
| 24          | Defendants.   | (-           | FIRST REQUEST                  | ,                |  |  |  |
| 25          |   |              |                                |                  |  |  |  |

Pursuant to LR IA 6-1, Plaintiff C.C. ("Plaintiff") and Defendants Wynn Las Vegas, LLC,

Highgate Hotels, L.P., The Light Group, LLC, STK Las Vegas, LLC, The One Group Hospitality,

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good faith and not for purposes of delay.

- Inc., and The One Group LLC ("Defendants") (together, the "Parties"), by and through their respective counsel of record, hereby agree and stipulate as follows:
- 1. On December 20, 2024, this Court dismissed Plaintiff's TVPRA claims without prejudice as to most or all of the Parties. (ECF. No. 115).
- 2. That same day, this Court dismissed Plaintiff's state law claims (N.R.S. § 41.1399 and intentional infliction of emotional distress) with prejudice as to all of the Parties. (ECF. No. 115).
- 3. The Court at the same time granted Plaintiff leave to amend her complaint by January 10, 2025. (ECF No. 115).
- 4. On January 10, 2025, Plaintiff filed a Motion for Leave to Amend her Complaint. (ECF No. 117). Plaintiff's proposed Second Amended Complaint brings beneficiary and/or perpetrator liability claims under the TVPRA against all Defendants.
- 5. On January 27, 2025, this Court granted Plaintiff's Motion for Leave to Amend her Complaint and directed the Clerk of Court to file Plaintiff's Second Amended Complaint on the docket. (ECF No. 124).
- 6. On January 29, 2025, this Court granted Nevada Property 1, LLC, MGM Resorts International, and Aria Resort & Casino LLC's Stipulation Modifying Deadline to Respond to Plaintiff's Second Amended Complaint, extending the deadline for those defendants and for MGM Grand Hotel, LLC to respond to February 18, 2025. (ECF No. 127).
- 7. In the interests of judicial economy, the Parties respectfully stipulate that Defendants' time to respond to the Second Amended Complaint be extended to February 18, 2025. This is Defendants' first request to extend time to file a response to the complaint.

Complaint. This extension would allow the preservation of judicial and party resources and would

allow Defendants to proceed on the same schedule as Nevada Property 1, LLC, MGM Resorts

International, Aria Resort & Casino LLC and MGM Grand Hotel, LLC. This request is made in

Good cause exists to enlarge the time for Defendants to respond to Plaintiff's

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| 1   | WHEREAS the Parties respectfully request that Wynn Las Vegas, LLC, Highgate Hotels,               |   |  |  |  |  |
|-----|---|---|--|--|--|--|
| 2   | L.P., The Light Group, LLC, STK Las Vegas, LLC, The One Group Hospitality, Inc., and The One      |   |  |  |  |  |
| 3   | Group LLC shall have until February 18, 2025 to answer, move, or otherwise respond to Plaintiff's |   |  |  |  |  |
| 4   | Second Amended Complaint.   |   |  |  |  |  |
| 5   | IT IS SO STIPULATED.  |   |  |  |  |  |
| 6   | DATED this 5th day of February, 2025.   |   |  |  |  |  |
| 7   |   |   |  |  |  |  |
| 8   | Respectfully Submitted,   |   |  |  |  |  |
| 9   |   |   |  |  |  |  |
| 10  | /s/ Geoffrey C. Parker  | /s/ Nicole M. Perry   |  |  |  |  |
| 10  | Michael C. Kane<br>Nevada Bar No. 10096   | Nicole M. Perry, <i>Pro Hac Vice</i><br>JONES DAY             |  |  |  |  |
| 11  | Bradley J. Myers  | 717 Texas Street, Suite 3300                                  |  |  |  |  |
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| 13  | Nevada Bar No. 11597<br>THE 702 FIRM  | Facsimile: (832) 239-3600                                     |  |  |  |  |
| 13  | 400 South Seventh Street, Suite 400   | Email: nmperry@jonesday.com                                   |  |  |  |  |
| 14  | Las Vegas, NV 89101   | Bethany K. Biesenthal, Pro Hac Vice                           |  |  |  |  |
|     | Telephone: (702) 776-3333   | Allison L. McQueen, <i>Pro Hac Vice</i>                       |  |  |  |  |
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| 16  | brad@the702firm.com   | Chicago, IL 60606   |  |  |  |  |
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| 17  | Geoffrey C. Parker  | Facsimile: (312) 782-8585                                     |  |  |  |  |
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| 10  | HILTON PARKER LLC<br>7658 Slate Ridge Boulevard   | amcqueen@jonesday.com   |  |  |  |  |
| 19  | Reynoldsburg, Ohio 43068  | Patrick G. Byrne  |  |  |  |  |
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| 20  | Facsimile: (614)927-5980  | Dawn Davis  |  |  |  |  |
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| 21  |   | SNELL & WILMER  |  |  |  |  |
| 22  | Attorneys for Plaintiff C.C.  | 3883 Howard Hughes Parkway, Suite 1100<br>Las Vegas, NV 89169 |  |  |  |  |
| 23  |   | Telephone: (702) 784-5275<br>Facsimile: (702) 784-5252        |  |  |  |  |
| 24  |   | Email: pbyrne@swlaw.com                                       |  |  |  |  |
|     |   | ddavis@swlaw.com  |  |  |  |  |
| 25  |   | Attorneys for Defendants                                      |  |  |  |  |
| 26  |   | Wynn Las Vegas, LLC   |  |  |  |  |
| 27  |   |   |  |  |  |  |
| 28  |   |   |  |  |  |  |

| 1  | /s/ Maria Thompson  |
|----|---|
| 2  | Maria Thompson<br>Nevada Bar No. 16762                                      |
|    | Josh Cole Aicklen   |
| 3  | Nevada Bar No. 007254<br>LEWIS BRISBOIS BISGAARD                            |
| 4  | & SMITH, LLP  |
| 5  | 6385 South Rainbow Boulevard, Suite 600<br>Las Vegas, NV 89118              |
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| 7  | Attorneys for Defendant   |
| 8  | Highgate Hotels, L.P.   |
| 9  | /s/ Sebastian Cribari   |
| 10 | Jeremy R. Alberts   |
| 10 | Nevada Bar No. 10497<br>Christopher T. Bryd                                 |
| 11 | Nevada Bar No. 6582   |
| 12 | Sebastian Cribari<br>Nevada Bar No. 15888                                   |
|    | WEINBERG WHEELER HUDGINS  |
| 13 | GUNN & DIAL, LLC<br>6385 South Rainbow Boulevard, Suite 400                 |
| 14 | Las Vegas, NV 89118   |
| 15 | Telephone: (702) 938-3838   |
|    | Facsimile: (702) 938-3864<br>Email: jalberts@wwhgd.com                      |
| 16 | cbyrd@wwhgd.com   |
| 17 | scribari@wwhgd.com  |
| 18 | Attorneys for Defendant   |
|    | The Light Group, LLC  |
| 19 | /s/ Jennifer L. Braster Jennifer L. Braster                                 |
| 20 | Jennifer L. Braster<br>Nevada Bar No. 9982                                  |
| 21 | Meredith L. Markwell  |
| 21 | Nevada Bar No. 9203<br>NAYLOR & BRASTER                                     |
| 22 | 10100 W. Charleston Blvd., Suite 120  |
| 23 | Las Vegas, NV 89135<br>Telephone: (702) 420-7000                            |
|    | Email: jbraster@nblawnv.com   |
| 24 | mmarkwell@nblawnv.com   |
| 25 | Attorneys for Defendants  |
| 26 | STK Las Vegas, LLC, The One Group, LLC, and The One Group Hospitality, Inc. |
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| 28 | 4   |
|    | - 4 -   |

| 1        | IT IS SO ORDERED. Defendants Wynn Las Vegas, LLC, Highgate Hotels, L.P., The Light Group, LLC, STK Las Vegas, LLC, The One Group Hospitality, Inc., and The One Group LLC |
|----------|---|
| 2        | shall have until February 18, 2025 to answer, move, or otherwise respond to Plaintiff's Second Amended Complaint.   |
| 3        |   |
| 4<br>5   | Berbweten   |
| 6        | UNITED STATES MAGISTRATE JUDGE  |
| 7        | DATED: February 6, 2025   |
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